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Theodore Weiss
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August 10, 2018

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

*Re: Freedom of Information Act Request - the Former Aluminum Company of America
("Alcoa") Properties in the City of Vernon, California*

Dear Sir/Madam:

By this letter and pursuant to the provisions of the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552, we hereby request that the U. S. Environmental Protection Agency ("EPA") provide us with copies of the following public records, regarding the former Aluminum Company of America ("Alcoa") facility located at the southeast corner of the intersection of Boyle Avenue and Fruitland Avenue in the City of Vernon (the "Alcoa Facility"). The former Alcoa Facility was sold by Alcoa in 1999 as follows: Parcels 1 and 5 of Parcel Map 24894 were sold to Xebec, LLC; Parcels 2, 3 and 4 of Parcel Map 24894 were sold to XA Partners, LLC; and Parcels 6, 7 and 8 were sold to Century Cast Plate, Inc. (together, the "Properties"). See attached Grant Deeds for reference. Street addresses associated with the former Alcoa Facility and the Properties include, but are not limited to, 5101, 5151 and/or 5401 Alcoa Avenue and 3200 Fruitland Avenue.

The scope of this request includes public records related to the Alcoa Facility during Alcoa's period of ownership, up through 1999. The specific categories of public records sought by this request include the following:

- a. Any orders or agreements between EPA and Alcoa related to Alcoa's investigation, assessment, cleanup, and/or remediation of polychlorinated biphenyls spills and/or releases at the Properties other than the Consent Agreement and Final Order between Alcoa and EPA dated February 12, 1990 (Docket No. TSCA-09-89-0015), attached for reference;
- b. Documents and information related to EPA's December 14, 1995 Toxic Substances Control Act compliance inspection of the Properties.

Regional Freedom of Information Officer

August 10, 2018

Page 2

Please respond to this request and provide copies of the requested documents within the time set forth in Section 552(a)(6)(A)(1) of the Act. Pursuant to Section 552(a)(4)(A) of the Act, you are authorized to assess certain fees and costs incurred in responding to the request. However, prior to preparing copies of the responsive documents, I request that you contact me first to discuss the amount of documents obtained in responding to the request.

Please do not hesitate to contact me should you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to be 'TW' or similar initials, written in a cursive style.

Theodore Weiss

Enclosures

cc: Ryan D. Fischbach Esq.

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99 0509963

RECORDED/FILED IN OFFICIAL RECORDS
 RECORDER'S OFFICE
 LOS ANGELES COUNTY
 CALIFORNIA
 MAR 26 1999 AT 8 A.M.

SPACE ABOVE THIS LINE RESERVED FOR RECORDER S USE

TITLE(S)

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NOTIFICATION SENT-3 ©

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Assessor s Identification Number (AIN)
 To Be Completed By Examiner Or Title Company In Black Ink

Number of Parcels Shown

4310-008-003

001

Revision Number

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RECORDING REQUESTED BY
OLD REPUBLIC TITLE COMPANY

WHEN RECORDED RETURN TO

99 0509963

Name XEBEC, LLC
Address
City, St ATTN: JOHN F. LEHR, JR
Zip 2500 MICHELSON DR.
SUITE 200
IRVINE, CA 92612

SPACE ABOVE FOR RECORDERS USE

Order No 814788-44
614194-44

TITLE(s) OF DOCUMENT

GRANT DEED

TRANSFER TAX
NOT A PUBLIC RECORD

Assessors Identification Number (AIN) 6310 - 008 - 003
6310 006 001

OLD REPUBLIC
TITLE COMPANY

(recording cover page 99)

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GRANT DEED

RECORDING REQUESTED BY AND
WHEN RECORDED RETURN TO
XEBEC, LLC

Attention John F Lehr, Jr
Address 2500 Michelson Drive, Suite 200
Irvine, California 92612

MAIL TAX STATEMENTS TO
XEBEC, LLC

Attention John F Lehr, Jr
Address 2500 Michelson Drive, Suite 200
Irvine, California 92612

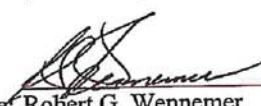
Documentary transfer tax is not of public record and
is shown on a separate sheet attached to this Deed

GRANT DEED

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, ALCOA INC
(formerly "Aluminum Company of America"), a Pennsylvania corporation, hereby grants to
XEBEC, LLC, a California limited liability company, the real property located in Vernon,
County of Los Angeles, State of California, described on Exhibit "A" attached hereto

Executed as of this 18th day of March, 1999

ALCOA INC
a Pennsylvania corporation

By 
Name Robert G Wennemer
Title Vice President Treasurer

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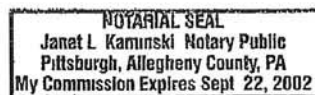
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COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF ALLEGHENY)

On March 18th, 1999 before me, Janet L. Kaminski, personally appeared Robert G. Wennemer, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the entity upon behalf of which the person acted, executed the instrument
WITNESS my hand and official seal

Signature Janet L. Kaminski

(Seal)



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GRANT DEED - XEBEC, LLC

EXHIBIT "A"

LEGAL DESCRIPTION

PARCELS 1 and 5 as shown on Parcel Map No 24894, in the City of Vernon, County of Los Angeles, State of California, filed in Book of Parcel Maps 286, Pages 46 through 48, all in the office of the Recorder of the County of Los Angeles

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RECORDED/FILED IN OFFICIAL RECORDS
RECORDER'S OFFICE
LOS ANGELES COUNTY
CALIFORNIA

MAR 26 1999 AT 8 A.M.

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

TITLE(S)

DEED

NOTIFICATION SENT \$
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EXAMINER'S INT

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Assessor's Identification Number (AIN)
To Be Completed By Examiner Or Title Company In Black Ink

Number of Parcels Shown

6310-008-003

001

Revision Number

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RECORDING REQUESTED BY
OLD REPUBLIC TITLE COMPANY

WHEN RECORDED RETURN TO

99 0509971

Name
Address XA PARTNERS, LLC
City St ATTN. JOHN F LEHR, JR.
Zip 2500 MICHELSON DR.
SUITE 200
IRVINE, CA 92612

SPACE ABOVE FOR RECORDERS USE

Order No 837119-44

TITLE(s) OF DOCUMENT

GRANT DEED

TRANSFER TAX
NOT A PUBLIC RECORD

Assessors Identification Number (AIN)	6310	-	008	-	003
	6310		006		001
	6410		007		009



(recording cover page 99)

3

GRANT DEED

RECORDING REQUESTED BY AND
WHEN RECORDED RETURN TO
XA PARTNERS, LLC
Attention John F Lehr, Jr
Address 2500 Michelson Drive, Suite 200
Irvine, California 92612

MAIL TAX STATEMENTS TO
XA PARTNERS, LLC
Attention John F Lehr, Jr
Address 2500 Michelson Drive, Suite 200
Irvine, California 92612

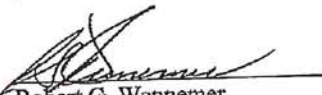
Documentary transfer tax is not of public record and
is shown on a separate sheet attached to this Deed

GRANT DEED

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, ALCOA INC
(formerly "Aluminum Company of America"), a Pennsylvania corporation, hereby grants to
XA PARTNERS, a California limited liability company, the real property located in Vernon,
County of Los Angeles, State of California, described on Exhibit "A" attached hereto

Executed as of this 18th day of March, 1999

ALCOA INC
a Pennsylvania corporation

By 
Name Robert G Wennemer
Title Vice President Treasurer

Mail Tax Statements To Return Address Above

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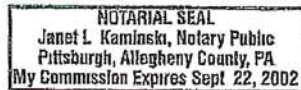
COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF ALLEGHENY)

On March 18th, 1999 before me, Janet L. Kaminski, personally appeared Robert G. Wennemer, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the entity upon behalf of which the person acted, executed the instrument
WITNESS my hand and official seal

Signature



(Seal)



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GRANT DEED - XA PARTNERS, LLC

EXHIBIT "A"

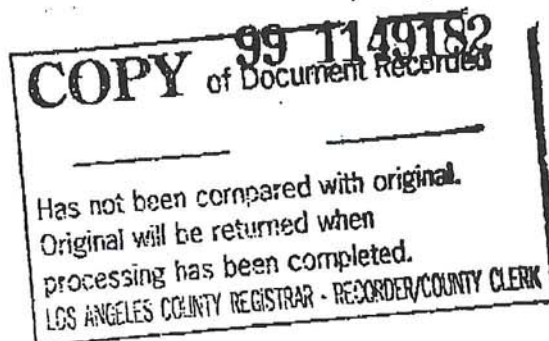
LEGAL DESCRIPTION

PARCELS 2, 3 and 4 as shown on Parcel Map No 24894, in the City of Vernon, County of Los Angeles, State of California, filed in Book of Parcel Maps 286, Pages 46 through 48, all in the office of the Recorder of the County of Los Angeles

6144058A-X59

RECORDING REQUESTED BY AND
WHEN RECORDED RETURN TO:
CENTURY CAST PLATE, INC.
c/o CENTURY ALUMINUM COMPANY
Attention: Peter McGuire
2511 Garden Road
Building A, Suite 200
Monterey, CA 93940

JUN 23 1999



MAIL TAX STATEMENTS TO:
CENTURY CAST PLATE, INC.
c/o CENTURY ALUMINUM COMPANY
Attention: Peter McGuire
2511 Garden Road
Building A, Suite 200
Monterey, CA 93940

Documentary transfer tax is not of public record and
is shown on a separate sheet attached to this Deed.

GRANT DEED

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, ALCOA INC. (formerly "ALUMINUM COMPANY OF AMERICA"), a Pennsylvania corporation, hereby grants to CENTURY CAST PLATE, INC., a Delaware corporation, the real property located in Vernon, County of Los Angeles, State of California, described on Exhibit "A" attached hereto.

Executed as of this 15th day of June, 1999.

ALCOA INC.
(formerly Aluminum Company of America),
a Pennsylvania corporation

By Richard B. Kelson
Name Richard B. Kelson
Title Executive Vice President and Chief
Financial Officer

APN 6310-6-1; 6310-8-3; 6310-7-9.

COMMONWEALTH OF PENNSYLVANIA)

)

COUNTY OF ALLEGHENY)

On June 15, 1999, before me, Carol B. Halferty, personally appeared Richard B. Kelson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Carol Halferty

(Seal)

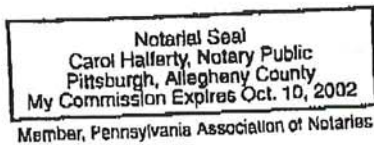


EXHIBIT A
LEGAL DESCRIPTION

PARCELS 6, 7 and 8, as shown on Parcel Map No. 24894, in the City of Vernon, County of Los Angeles, State of California, filed in Book of Parcel Maps 286, pages 46 through 48, inclusive, all in the office of the Recorder of the County of Los Angeles.

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10 UNITED STATES
11 ENVIRONMENTAL PROTECTION AGENCY
12 REGION 9

13 In re:) Docket No. TSCA-09-89-0015
14)
15 ALUMINUM COMPANY OF AMERICA,) CONSENT AGREEMENT
16 Respondent.) AND
17) FINAL ORDER

18 I

19 This administrative proceeding for the assessment of a civil
20 penalty was initiated pursuant to Section 16(a) of the Toxics
21 Substances Control Act, as amended (TSCA), [15 U.S.C. 2615(a)].
22 The action was instituted by a Complaint and Notice of
23 Opportunity for Hearing (Complaint) issued on August 15, 1989.
24 The Complaint charged Aluminum Company of America (Respondent),
25 with the violation of 40 C.F.R. 761.30(e), 761.60(a) and (d),
26 761.65, 761.180(a) and Section 15(1) of TSCA [15 U.S.C.
27 2614(1)(c)] at the facilities owned by Respondent located at 5151
Alcoa Avenue, Vernon, California (Facility). Complainant is the

1 United States Environmental Protection Agency (EPA), Region 9.

2 II

3 Respondent and Complainant admit and agree that the Regional
4 Administrator, EPA Region 9, has jurisdiction of the subject
5 matter of the action set out in the Complaint and over the
6 parties thereto, pursuant to 15 U.S.C. 2615 and 40 C.F.R.
7 22.04(a).

8 III

9 Respondent neither admits nor denies the specific factual
10 allegations made in the Complaint. Respondent hereby waives any
11 rights which it may have to a hearing on any issues set out in
12 the Complaint. Complainant waives whatever rights it may have to
13 compel Respondent to answer or otherwise defend the Complaint.
14 Respondent consents to the issuance of this Consent Agreement and
15 Final Order without adjudication.

16 IV

17 By signing this Consent Agreement and Final Order,
18 Respondent agrees to pay a civil penalty in the amount of FOUR
19 THOUSAND EIGHT HUNDRED FIFTY DOLLARS in lieu of NINE THOUSAND
20 SEVEN HUNDRED DOLLARS in the Complaint. The penalty adjustment
21 set out herein above is based upon: 1) Respondent's good faith
22 efforts to come into compliance with the TSCA regulations and 2)
23 The Respondent's cooperation with the Environmental Protection
24 Agency during settlement negotiations in the form of
25 representations by Respondent's representatives which were
26 followed by submission of Draft Clean-Up Agreements for PCB
27 contamination in the #10 Press Building.

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V

In executing this Consent Agreement and Final Order,
Respondent agrees to undertake the following tasks and mitigative
measures:

1. Respondent shall implement the requirements of 40 C.F.R. 761.180(a) with respect to the maintenance of records. Respondent shall submit to Complainant within 30 days after execution of this Consent Agreement by Respondent the PCB annual document format to be used in complying with this Agreement and shall submit a revised 1987 PCB annual document in accordance with 40 C.F.R. 761.180(a).
2. Within 45 days after the execution of this Consent Agreement and Final Order by Respondent, Respondent shall provide Complainant with documentation in the form of disposal manifests confirming that the Peeler Press and the Straightening Press have been disposed in accordance with 40 C.F.R. 761.60.
3. Within 45 days after the execution of this Consent Agreement and Final Order by Respondent, Respondent shall provide Complainant with copies of the site assessments conducted at the Peeler Press area and the Straightening Press area. Copies of site assessments shall include identification of sample locations, sample analysis results, description of any cleanup conducted and disposal manifests for any cleanup materials. The documentation shall confirm that standards required by

1 40 C.F.R 761.120 have been met.

2 4. Respondent shall provide Complainant within 60 days
3 after the execution of this Consent Agreement and Final
4 Order by Respondent with documentation in the form of
5 disposal manifests indicating that the 1000 Ton Forge
6 Press has been disposed of in accordance with 40 C.F.R.
7 761.60.

8 5. Respondent shall provide Complainant within 90 days
9 after the execution of this Consent Agreement and Final
10 Order by Respondent with a narrative description of
11 Respondent's PCB and lead cleanup effort at the 1000 Ton
12 Forge Press area supported by documentation such as:
13 Identification of sample locations, preliminary sample
14 analysis results, cleanup procedures, cleanup materials
15 used, final verification sampling results, and manifests
16 indicating proper disposal of cleanup debris. The
17 documentation shall indicate that standards required by
18 40 C.F.R. 761.120 have been met.

19 6. Within 30 days of execution of this Consent
20 Agreement and Final Order, Respondent shall begin a
21 program of PCB cleanup, as outlined in Attachment #1 of
22 this Consent Agreement and Final Order, in the #10 Press
23 Building (Extrusion Press Building). Respondent shall
24 submit to Complainant within ten consecutive days after
25 the end of each calendar quarter for a period of six
26 consecutive calendar quarters on and after the date of
27 execution of this Agreement by Respondent, a complete

report which shall indicate the status of the cleanup project. In the event that Respondent has completed all of the tasks and submitted all of the documentation required by this Article V.6,, the report set out herein will not be required.

7. Within 30 days after the execution of this Consent Agreement and Final Order, Respondent shall submit payment in the amount of FOUR THOUSAND EIGHT HUNDRED FIFTY DOLLARS. The payment shall be sent to:

EPA - Region 9
Regional Hearing Clerk
P. O. Box 360863M
Pittsburgh, PA 15251

VI

In the event Respondent is unable to complete the tasks set out in Article V above, within the prescribed time, Complainant will extend the agreed performance period upon Respondent's written request, provided that Respondent can demonstrate to Complainant's reasonable satisfaction that Respondent has used its best efforts to comply with the specified requirements.

All submissions under this Consent Agreement and Final Order (other than the payment of civil penalty) shall be addressed as follows:

Greg Czajkowski, Chief
Toxics Section, A-4-2
Air and Toxics Division
U.S. Environmental Protection Agency
Region 9
215 Fremont Street
San Francisco, CA 94105

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VII

This Agreement does not relieve Respondent from compliance with monitoring and from enforcement actions for TSCA violations not addressed by this Agreement, including but not limited to all non-civil enforcement actions, or from enforcement actions under laws administered by State or local environmental authorities, except where TSCA would pre-empt such laws and the specific violations are governed by the Agreement.

VIII

In executing this Consent Agreement and Final Order, Respondent agrees to pay the civil penalty in accordance with the conditions and timeframes specified in the FINAL ORDER set forth below. In accordance with the Debt Collection Act of 1982 and U.S. Treasury (TFRM 6-8000), payment must be received with 30 days after the execution of this Consent Agreement and Final Order to avoid additional charges. If not received, interest will accrue from the date of execution at the current interest rate published by the U.S. Treasury. A late penalty charge of \$20.00 per thousand dollars of the proposed penalty will be imposed with an additional charge of \$10.00 for each subsequent 30-day period. A 6% per annum penalty will be applied on any principal amount not paid within 90 days of the due date. In addition, if payment is not made within the required timeframe, Respondent shall be liable for the full amount of the civil penalty of NINE THOUSAND SEVEN HUNDRED DOLLARS as specified in the Final Order below.

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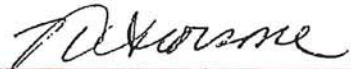
In the event that Respondent fails to perform any task set forth in this Consent Agreement and Final Order within the specified time, unless such time has been extended pursuant to Article IX, Respondent shall be deemed to be in default of this Consent Agreement and Final Order.

In the event that Respondent is deemed to be in default of this Consent Agreement and Final Order, Respondent agrees to pay Complainant the balance of the unpaid portion of the full amount of the civil penalty of NINE THOUSAND SEVEN HUNDRED DOLLARS within fifteen (15) days after Respondent's receipt of an Order of Non-Remittance.

X

Complainant and Respondent consent to the entry of this Agreement and Final Order without further notice.

February 12, 1990
Date


Respondent Vincent R. Scorsone
Group Vice Pres.-Aerospace & Industrial Products
(print name and title)

Date

David P. Howekamp
Director
Air and Toxics Division

1 FINAL ORDER

2 IT IS HEREBY ORDERED that this Consent Agreement and Final Order
3 (Docket No. TSCA-09-89-0015) be entered and Respondent shall pay
4 by cashier's check or certified check made payable to the
5 Treasurer, United States of America, within thirty (30) days
6 after the execution of this Consent Agreement and Final Order,
7 and addressed as follows:

8 EPA - Region 9
9 Regional Hearing Clerk
P.O. Box 360863M
10 Pittsburgh, PA 15251

11 a civil penalty in the amount of FOUR THOUSAND EIGHT HUNDRED
12 FIFTY DOLLARS (\$4,850.00). A copy of the check shall be sent to
13 the EPA Region 9 address specified in Article VI above within
14 thirty (30) days after the execution of this Consent Agreement
15 and Final Order. In the event Complainant determines that
16 Respondent has failed to complete all of the tasks identified in
17 Article V above within the specified timeframes, the balance of
18 the unpaid portion of the full amount of the civil penalty of
19 Nine Thousand Seven Hundred Dollars shall be due within fifteen
20 (15) days after Respondent's receipt of an order of
21 non-remittance. Such balance shall be paid by cashier's check or
22 certified check, made payable to the Treasurer, United States of
23 America, and sent to the Pittsburgh address specified above.

24 This order shall become effective immediately.

25
26 _____
Date

27 _____
Steven W. Anderson
Regional Judicial Officer
US EPA
Region 9

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3 ATTACHMENT #1
4 CONSENT AGREEMENT AND FINAL ORDER
5 DOCKET NUMBER TSCA-09-89-0015
6

7 1. Conduct site assessment of all accessible areas in the #10
8 Press Building (Extrusion Press Building) to determine PCB
9 contamination by analyzing standard wipe samples and core
10 samples. The sampling plan shall follow guidelines described in
11 "Field Manual for Grid Sampling of PCB Spill Sites to Verify
12 Cleanup," EPA document number EPA560/5-86/017.
13

14 2. The above referenced characterization will include soil
15 sampling for detection of PCB contamination under the Building.
16 Aluminum Company of America to provide a diagram of the #10 Press
17 Building and indicate proposed locations of soil sampling sites.
18 The number and locations of soil samples to be taken to be agreed
19 upon by Aluminum Company of America and EPA and the results of
20 wipe, core and soil sampling to be submitted to EPA. Should a
21 probability of potential groundwater contamination by PCBs exist,
22 ALCOA should then be prepared to take appropriate remedial action
23 to eliminate any risk to groundwater posed by the PCBs.
24

25 3. ALCOA will select and indicate to EPA at least four areas of
26 concrete, two vertical and two horizontal, representing highly
27 contaminated and moderately contaminated areas, and shall clean
them using a high pressure blaster and an appropriate cleaning
solution followed by clean water rinse. The highly contaminated
area will be chosen to represent the highest 10% of measured
contamination while the moderately contaminated area will have
PCB contamination of approximately 100 ug/100 sq. cm.

4. Verification sampling will be conducted in the four areas
after one week and again after one month to determine efficiency
of above referenced cleaning methods. If determined to be
successful, this cleaning technique will be used on all
accessible contaminated areas.

5. Accessible areas that show PCB contamination greater than 100
ug/100 sq. cm. must be recleaned until decontamination levels
fall within standards outlined by the PCB Spill Cleanup Policy 40
C.F.R. 761.120. Accessible restricted access, low contact,
indoor, nonimpervious surfaces may be cleaned to 100 ug/100 sq.
cm. if then encapsulated.

6. In areas where cleaning has failed to meet the required
standards, ALCOA, where practical, will consider concrete removal
in those areas in order to reach PCB Spill Cleanup Policy
decontamination levels.

7. Within 240 days after the execution of this Consent Agreement

1 and Final Order, Respondent shall provide Complainant with with a
2 narrative description of cleanup effort at #10 Press Building and
3 shall include documentation such as: Cleanup procedures, cleanup
4 materials used, identification of verification sample locations,
5 final verification sampling results, and manifests indicating
6 proper disposal of cleanup debris.

7 B. Cleanup of all currently accessible areas in #10 Press
8 Building shall be accomplished within 180 days from the effective
9 date of this Consent Agreement and Final Order. In the event
10 that Respondent is unable to complete the cleanup in time frame
11 specified, Respondent shall make application in writing to EPA at
12 the address specified in Article VI above for an extension of
13 time. The application for an extension of time shall be
14 submitted at least seven (7) days in advance for the date for
15 performance of items 7 and 8 of this attachment.

16 9. At such time that the Facility is no longer in operation, or
17 if the Facility is sold or transferred, or if any long term
18 shutdown of the Facility occurs, full cleanup of PCB
19 contamination in the #10 Press Building shall occur, with PCB
20 Spill Clean Up Policy Standards 40 C.F.R. 761.120 standards being
21 met.

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